

## **REMARKS**

Claims 1, 3, 5, 7-12, 14-18, 20, 21, 23, 25, 27, 28, 30, 32, 34-36, 38, and 40 are pending in the application.

Claims 1, 3, 5, 7-12, 14-18, 20, 21, 23, 25, 27, 28, 30, 32, 34-36, 38, and 40 are currently amended and claims 2, 4, 6, 13, 19, 22, 24, 26, 29, 31, 33, 37, and 19 are cancelled. Applicants respectfully submit that no new matter is added to currently amended claims 1, 3, 5, 7-12, 14-18, 20, 21, 23, 25, 27, 28, 30, 32, 34-36, 38, and 40.

Claims 1-40 stand rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 6,058,435 to Sassin et al., hereinafter, Sassin.

Applicants respectfully traverse the rejection based on the following discussion.

### **I. The 35 U.S.C. 102(b) Rejection as Anticipated by Sassin**

#### **1. The Sassin Disclosure**

Sassin discloses that the present invention can be implemented in a wide variety of systems in which the response to a communication can advantageously depend on the content of the communication. A simple example of such a system is an information retrieval service, in which the service receives a communication from a customer requesting certain information, and the service responds by sending the requested information to the customer. (col. 1, lines 16-23, which is cited by the Office Action).

Sassin also discloses that communications between the information distribution system 10 and remote sites preferably are made in a number of different manners. A public switched telephone network (PSTN) 12 is shown as being connected to a facsimile device 14 and a voice input device, such as a telephone 16. The PSTN is linked to switch circuitry 10 of the information distribution system 10. While not critical, the switch circuitry may be circuitry of a private branch exchange (PBX). The facsimile device 14 and the telephone 16 (or other voice input device) are user interfaces that enable substantial content freedom for communications between a submitting party and the information distribution system 10. As will be explained more fully below, the freeform communications are converted to an appropriate format for

executing content analysis to determine a routing scheme for the communications or responses to the communications. (col. 5, lines 13-28, which is cited by the Office Action).

Sassin further discloses that an incoming communication from the voice input device 16, e.g., a telephone, may be recorded at a conventional voice mail device 38 and converted to text at a voice-text converter 40. The voice-text converter is a second mode-specific device that provides an input to the format converter 36. The voice-text converter may be a speech recognition module that converts the recorded freeform voice mail message into text information. the format converter then presents the computer-searchable text information in an appropriate format to the content analyzer 32. (col. 6, lines 18-29, which is cited by the Office Action).

Sassin illustrates, in Fig. 4, that the response system 100 receives freeform communications from one or more of a variety of sources, in one or more of a variety of media. For example, the communication may be a video clip, a photographic image, an e-mail, a facsimile, a voice message or real time voice, or an Internet form or other communication from the World Wide Web. A multimedia switch 104 controls the routing of the incoming communications. The response system 100 also comprises a multimedia message unit 102, which may be used to store communications of various media. For example, the messaging unit 102 may store an incoming facsimile communication until the response system 100 is prepared to process the communication. Thus, the switch 104 may route incoming communications directly to a media converter 106, or may route the incoming communications to the message unit 102 for storage. At some time later, the switch 104 can retrieve the stored communications from the messaging unit 102 and forward the communications to the media converter 106. Alternatively, the media converter 106 can access the stored communications directly from the messaging unit 102. (col. 11, lines 40-62, which is cited by the Office Action).

## **2. Arguments**

Currently amended, independent claims 1 and 8 recite in relevant part,

"a first communication system that communicates with first users by a first addressing scheme and a first communication format for any of data and voice, each of said first users having a first unique Internet Protocol (IP) address;

a second communication system that communicates with second users by a second addressing scheme and a second communication format for any of data and voice, each of said second users having a second unique Internet Protocol (IP) address; and

an interoperable communication server, comprising:

a message transfer unit that transfers any of data and voice messages between a first user at said first unique IP address and a second user at said second unique IP address;

wherein said first addressing scheme is incompatible with said second addressing scheme; and

wherein a global directory, using a common hierarchical addressing scheme for said first unique IP address and said second unique IP address, connects a first user at said first unique IP address to a second user at said second unique IP address".

Similarly, currently amended, independent claim 15 recites in relevant part,

"a message transfer unit that transfers any of data and voice messages between first users of a first communication system and second users of a second communication system;

wherein said first communication system communicates with said first users by a first addressing scheme and a first communication format for any of data and voice, each of said first users having a first unique Internet Protocol (IP) address;

wherein said second communication system communicates with said second users by a second addressing scheme and a second communication format for any of data and voice, each of said second users having a second unique IP address;

wherein said first addressing scheme is incompatible with said second addressing scheme; and

wherein a global directory, using a common hierarchical addressing scheme for said first unique IP address and said second unique IP address, connects a first user at said first unique IP address to a second user at said second unique IP address".

Similarly, currently amended, independent claims 21, 28, and 35 recite in relevant part, "transferring any of data and voice messages between first users of a first communication system and second users of a second communication system via an interoperable communication server;

wherein said first communication system communicates with said first users by a first addressing scheme and a first communication format for any of data and voice, each of said first users having a first unique Internet Protocol (IP) address;

wherein said second communication system communicates with said second users by a second addressing scheme and a second communication format for any of data and voice, each of said second users having a second unique IP address;

wherein said first addressing scheme is incompatible with said second addressing scheme; and

wherein a global directory, using a common hierarchical addressing scheme for said first unique IP address and said second unique IP address, connects a first user at said first unique IP address to a second user at said second unique IP address".

Sassin merely discloses a routing method for an information distribution system, where messages of various media are converted to a computer-searchable format and subjected to content analysis, so that responses may be sent to an appropriate agent based on the analyzed content.

In contrast, the present invention describes at least the features of: a message of a first communication format for any of data and voice and from a first user having a first unique IP address may be transmitted to a second user in a second communication format for any of data and voice at a second unique IP address, wherein the addressing schemes for the first and second unique IP addresses are incompatible and a global directory, residing in an interoperable

communication server, connects the first and second unique IP addresses by a hierarchical addressing scheme.

Nowhere does Sassin disclose, teach or suggest that the various messages received come from IP addresses, assigned by an addressing scheme, are incompatible with the IP addresses for the distribution of responses, because the distribution addresses use an incompatible addressing scheme. Nor does Sassin disclose, teach or suggest a hierarchical addressing scheme that may solve the problem of connecting two unique IP addresses that are each assigned by incompatible addressing schemes.

Instead, Sassin merely discloses a routing method for an information distribution system, where messages of various media are converted to a computer-searchable format and subjected to content analysis, so that responses may be sent to an appropriate agent based on the analyzed content.

For at least the reasons outlined above, Applicants respectfully submit that Sassin does not disclose, teach or suggest at least the present invention's features of: "a first communication system that communicates with first users by a first addressing scheme and a first communication format for any of data and voice, each of said first users having a first unique Internet Protocol (IP) address; a second communication system that communicates with second users by a second addressing scheme and a second communication format for any of data and voice, each of said second users having a second unique Internet Protocol (IP) address; and an interoperable communication server, comprising: a message transfer unit that transfers any of data and voice messages between a first user at said first unique IP address and a second user at said second unique IP address; wherein said first addressing scheme is incompatible with said second addressing scheme; and wherein a global directory, using a common hierarchical addressing scheme for said first unique IP address and said second unique IP address, connects a first user at said first unique IP address to a second user at said second unique IP address", as recited in currently amended, independent claims 1 and 8; "a message transfer unit that transfers any of data and voice messages between first users of a first communication system and second users of a second communication system; wherein said first communication system communicates with said first users by a first addressing scheme and a first communication

format for any of data and voice, each of said first users having a first unique Internet Protocol (IP) address; wherein said second communication system communicates with said second users by a second addressing scheme and a second communication format for any of data and voice, each of said second users having a second unique IP address; wherein said first addressing scheme is incompatible with said second addressing scheme; and wherein a global directory, using a common hierarchical addressing scheme for said first unique IP address and said second unique IP address, connects a first user at said first unique IP address to a second user at said second unique IP address", as recited in currently amended, independent claim 15; and "transferring any of data and voice messages between first users of a first communication system and second users of a second communication system via an interoperable communication server; wherein said first communication system communicates with said first users by a first addressing scheme and a first communication format for any of data and voice, each of said first users having a first unique Internet Protocol (IP) address; wherein said second communication system communicates with said second users by a second addressing scheme and a second communication format for any of data and voice, each of said second users having a second unique IP address; wherein said first addressing scheme is incompatible with said second addressing scheme; and wherein a global directory, using a common hierarchical addressing scheme for said first unique IP address and said second unique IP address, connects a first user at said first unique IP address to a second user at said second unique IP address", as recited in currently amended, independent claims 21, 28, and 35. Accordingly, Sassin does not anticipate the subject matter of currently amended, independent claims 1, 8, 15, 21, 28, and 35, and currently amended, dependent claims 3, 5, 7, 9-12, 14-18, 20, 23, 25, 27, 30, 32, 34, 36, 38, and 40 under 35 U.S.C. §102(b). The rejection of cancelled claims 2, 4, 6, 13, 19, 22, 24, 26, 29, 31, 33, 37, and 19 is moot. Withdrawal of the rejection of claims 1-40 under 35 U.S.C. §102(b) as anticipated by Sassin is respectfully solicited.

## **II. Formal Matters and Conclusion**

Claims 1, 3, 5, 7-12, 14-18, 20, 21, 23, 25, 27, 28, 30, 32, 34-36, 38, and 40 are pending in the application.

With respect to the Specification, Applicants explicitly incorporate U.S. Patent Application Serial No. 10/037,425, U.S. Patent Publication 200301250022 in the originally filed present application (please see, Paragraph [0019]). Therefore, Applicants propose amending the present Specification with explicatory transitions and paragraphs [0012], and [0023-26], respectively, from explicitly incorporated U.S. Patent Application Serial No. 10/037,425, U.S. Patent Publication 200301250022, to be located between paragraphs [0019] and [0020] of the present Specification

With respect to objection to Fig. 2 of the drawings, Fig. 2 is amended to show the required legends in the attached Replacement Sheet. Replacement Sheets for Figs. 1, 3, and 4 are also submitted to improve the legibility of the figures. The Examiner is respectfully requested to reconsider and withdraw the objection to Fig. 2 of the drawings.

With respect to the rejection of the claims over the prior art, Applicants respectfully submit that the currently amended claims are distinguishable over the prior art of record. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejection to the claims.

In view of the foregoing, Applicants submit that claims 1, 3, 5, 7-12, 14-18, 20, 21, 23, 25, 27, 28, 30, 32, 34-36, 38, and 40, all the claims presently pending in the application, are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest time possible.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-0457.

Respectfully submitted,

Dated: May 1, 2008

/Peter A. Balnave/  
Peter A. Balnave, Ph.D.  
Registration No. 46,199

Gibb & Rahman, LLC  
2568-A Riva Road, Suite 304  
Annapolis, MD 21401  
Voice: (410) 573-5255  
Fax: (301) 261-8825  
Email: Balnave@Gibb-Rahman.com  
Customer Number: 29154